

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JENNIFER L. RYAN,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
JUSTICE, *et al.*,

Defendants.

Civil Action No. 3:25-cv-00325-X-BT

DEFENDANTS' UNOPPOSED MOTION TO RESET RESPONSE DEADLINE

Defendants move unopposed under Federal Rule of Civil Procedure 6(b)(1)(A) to reset the consolidated response deadline for both defendants (the U.S. Department of Justice and Karen E. Rochlin, sued in her official and individual capacities) from June 30, 2025, to sixty (60) days after Plaintiff Jennifer L. Ryan files her planned amended complaint.

On May 8, 2025, the Court granted Defendants' unopposed motion to set a consolidated deadline for Defendants to respond to Plaintiff's original complaint for June 30, 2025. *See* Docs. 17, 18. After Defendants filed that motion, Plaintiff contacted Defendants' counsel about Plaintiff's intention to file a motion for leave to file an amended complaint by May 30, 2025. The parties have reached agreements whereby Defendants will not oppose Plaintiff's filing an amended complaint and Plaintiff agrees to

allow Defendants to respond to the amended complaint within sixty (60) days from the filing of the amended complaint.

Therefore, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendants respectfully move the Court to reset the consolidated response deadline for both defendants to sixty (60) days after Plaintiff files her amended complaint.

Respectfully submitted,

CHAD E. MEACHAM
Acting United States Attorney

/s/ Lisa R. Hasday
Lisa R. Hasday
Assistant United States Attorney
Texas Bar No. 24075989
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214-659-8737
Facsimile: 214-659-8807
lisa.hasday@usdoj.gov

Attorneys for Defendants

Certificate of Conference

I certify that, on May 20, 2025, I conferred with Plaintiff regarding this motion, and Plaintiff stated she does not oppose the motion.

/s/ Lisa R. Hasday
Lisa R. Hasday
Assistant United States Attorney

Certificate of Service

On May 21, 2025, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Lisa R. Hasday
Lisa R. Hasday
Assistant United States Attorney